

# **Exhibit B**

[Submitting Counsel on Signature Page]

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY  
PRODUCTS LIABILITY LITIGATION

Case No.: 4:22-md-03047-YGR

MDL No.: 3047

This Document Relates to:

ALL PERSONAL INJURY ACTIONS

**CASE MANAGEMENT ORDER NO. [REDACTED] :**

**[PROPOSED] ORDER GOVERNING  
AMENDMENTS TO SHORT-FORM  
COMPLAINTS FOR FILED CASES**

**I. APPLICABILITY AND SCOPE OF ORDER**

1. This Order Governing Amendments to Short-Form Complaints for Filed Cases (“Order”) applies to all short-form complaints (“SFCs”) in the above-captioned litigation. It implements the Court’s guidance in Case Management Order No. 13 (Dkt. No. 780) regarding the Court’s review of proposed amendments to SFCs.

**II. AMENDMENTS TO SHORT-FORM COMPLAINTS**

2. Plaintiffs shall provide at least five days written notice of any proposed amendment to an SFC to all Defendants in the MDL, as well as a short statement of the basis for seeking such amendment (*e.g.*, to supplement information regarding the age of first use or platform usage or to

1 add a Defendant).

2 3. Plaintiffs shall file a motion for leave to amend an SFC, unless there is consent by:  
3 (a) all parties currently named in the SFC; and (b) any non-parties that the proposed amended SFC  
4 seeks to add.

5 4. A proposed new Defendant has a limited intervention right under Rule 24 of the  
6 Federal Rules of Civil Procedure to oppose any amendment that seeks to add that Defendant to the  
7 case. A proposed new Defendant may file an opposition to the motion to amend without seeking  
8 leave to intervene.

9 5. The parties reserve all rights and defenses with respect to any claims asserted through  
10 a proposed amendment to an SFC.

11 **IT IS SO ORDERED.**

12 Dated: \_\_\_\_\_, 2024

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14 YVONNE GONZALEZ ROGERS  
15 UNITED STATES DISTRICT JUDGE  
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